

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Cover Page and Acronym List

Section I IU File Evaluation

Section II Data Review/Interview/IU Site Visit(s)

Section III Findings

☐ Attachment A Pretreatment Program Status Update

☐ Attachment B Pretreatment Program Profile

Attachment C Worksheets

☐ IU Site Visit Data Sheet

☐ WENDB Data Entry Worksheet

☐ RNC Worksheet

Attachment D Supporting Documentation

Control Authority (CA) name and address	Date(s) of audit
Clinton Utilities Board 1001 N. Charles Stewers Blvd Clinton, TN	6/30/16

AUDITOR (S)

Name	Title/Affiliation	Telephone Number
Laurel Kognstad	EPS I / TDEC - DWR	615-532-8786
Greg Mite	EC I / TDEC - DWR	865-594-5513

CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Joe Brock	Env. & Regulatory Compliance / CUR	865-220-6241

*Identified program contact

ACRONYM LIST

Acronym	Term
AO	Administrative order
BMP	Best management practices
BMR	Baseline monitoring report
CA	Control authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined wastestream formula
DMR	Discharge monitoring report
DSS	Domestic sewage study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement response plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-weighted average
Gpd	Gallons per day
IU	Industrial user
IWS	Industrial waste survey
MGD	Million gallons per day
MSW	Municipal solid waste
NA	Not applicable
ND	Not determined
NOV	Notice of violation
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and grease
PCI	Pretreatment compliance inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RNC	Reportable noncompliance
SIU	Significant industrial user
SNC	Significant noncompliance
SUO	Sewer use ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TOMP	Toxic organic management plan
TRC	Technical review criteria
TRE	Technical review evaluation
TRIS	Toxics release inventory system
TSDF	Treatment, storage, and disposal facility
TTO	Total toxic organics
UST	Underground storage tank
WENDB	Water Enforcement National Data Base

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section I of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.
2. The auditor should ensure that he/she follows up on any and all violations noted in the previous inspection and annual report during the course of the audit.
3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.
4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE <u>A</u> Industry name and address Aisin Automotive Castings, Tennessee, Inc. 221 Frank L. Diggs Drive Clinton, TN 37714		Type of industry Aluminum die casting	
<input checked="" type="checkbox"/> CIU 40 CFR <u>433.17, Article 6, 5, d, h</u>	Average total flow (gpd) ~122,600	Average process flow (gpd) ~82,000 per 2016 application	
Category(ies) <u>metal finishing, metal molding, casting</u>		Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU			
Comments Current permit effective: 7/1/14 - 6/30/16 Prev. permit effective: 1/25/12 - 12/31/13, extended due to local limits calcs CA has new permit effective 7/1/16 prepared & signed → this new permit was reviewed for the control mechanism portion of the file review.			

FILE <u>B</u> Industry name and address Powder Coat II, LLC 193 Frank L. Diggs Dr. Clinton, TN 37714		Type of industry Metal finishing/powder coating	
<input checked="" type="checkbox"/> CIU 40 CFR <u>433.17</u> , _____, _____	Average total flow (gpd) 	Average process flow (gpd) 36327	
Category(ies) <u>New source metal finishing</u>		Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU			
Comments Permit effective 7/1/14 - 6/30/16 New permit effective 7/1/16 - 6/30/18 → this permit was reviewed for the control mechanism portion of the file review.			

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)

FILE _____ Industry name and address 		Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____		Average total flow (gpd)	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU		Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments			

FILE _____ Industry name and address 		Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____		Average total flow (gpd)	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU		Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments			

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)		
FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		
General Comments		

SECTION I: IU EVALUATION

File <u>A</u>	File <u>B</u>	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM	
✓	✓				1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
n/a	n/a				a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
✓	✓				a. Statement of duration (≤ 5 years)	
✓	✓				b. Statement of nontransferability	
②	✓				c. Applicable effluent limits (local limits, categorical standards, Best Management Practices)	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
✓	✓				• Identification of pollutants to be monitored	
n/a	n/a				• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
①	①				• Sampling locations/discharge points	
✓	✓				• Sample types (grab or composite)	
✓	✓				• Reporting requirements (including all monitoring results)	
✓	✓				• Record-keeping requirements	
n/a	n/a				e. Statement of applicable civil and criminal penalties	
✓	✓				f. Compliance schedules	
✓	✓				g. Notice of slug loading	
✓	✓				h. Notification of spills, bypasses, upsets, etc.	
✓	✓				i. Notification of significant change in discharge	
✓	✓				j. 24-hour notification of violation/resample requirement	
✓	✓				k. Slug discharge control plan, if determined by the POTW to be necessary.	
Comments ① Sample location/ discharge point need to be more clearly specified ② The lead ^{LR} to eat monthly avg. and daily max. are inconsistent with the approved local limit and alternative categorical limit for AISIN						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
A	B				A. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					3. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					e. Documentation to support the POTW's determination	
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> Comments </div>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
A	B				B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
✓	✓	*			1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
✓	✓				a. Classification by category/subcategory	
✓	✓				b. Classification as new/existing source	
①	✓				c. Application of limits for all regulated pollutants	
n/a	n/a				d. Classification of nonsignificant CIU	403.3(v)(2)
①	✓				3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
n/a	n/a				4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
✓	n/a				5. Calculation and application of production based-standards	403.6(c)
✓	n/a				6. Calculation and application of CWF or FWA	403.6(d)&(e)
①	✓				7. Application of most stringent limit	403.8(f)(1)(ii)
Comments ① See pg. 8 comment ② * See file review completed by Greg Mize						

SECTION I: IU EVALUATION (Continued)

File <u>A</u>	File <u>B</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
					Sampling	
✓	*				1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
n/a					2. Sampling at frequency specified in approved program	
✓					3. Documentation of sampling activities	403.8(f)(2)(vi)
✓					4. Analysis for all regulated parameters	
✓					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
✓					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
n/a					7. Inspection at frequency specified in approved program	
✓					8. Documentation of inspection activities	403.8(f)(2)(vi)
✓					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
Comments ASIN inspections: 8/14/15, 8/15/14, 8/16/13, 2/22/13, 6/5/12, 6/8/11 *See file review completed by Greg Mize						

SECTION I: IU EVALUATION (Continued)

File <u>A</u>	File <u>B</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vi)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vi)
Comments <div style="margin-top: 10px;"> <p>* See file review completed by Greg Mize</p> </div>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
A	B				E. IU COMPLIANCE STATUS	
					Self-Monitoring and Reporting	
✓	*				1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓					2. Analysis of all required pollutants	403.12(g)(1)&(h)
✓					3. Submission of BMR/90-day report	403.12(b) &(d)
✓					4. Periodic self monitoring reports	403.12(e)&(h)
✓					5. Reporting all required pollutants	403.12(g)(1)&(h)
n/a					6. Signatory/certification of reports	403.12(l)
n/a					7. Annual certification by NSCIUs	403.12(q)
					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
✓					• Discharge violation	
n/a					• Slug load	
Ⓢ					• Accidental spill	
✓					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
n/a					11. Notification of hazardous waste discharge	403.12(j)&(p)
✓					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
n/a					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing an "X" in the appropriate box.						
N/A, in compliance					Discharge	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	403.5(a)(1)
					• Spill or slug load	403.12(f)
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
					16. SNC with reporting requirements	403.8(f)(2)(vii)
Comments A slug control plan is on file dated 8/18/16 and will be updated August 2016. Mr. Brock stated they will address the oil/water separator that caused the accidental spill. Ⓢ see attached June 2016 accidental discharge documentation. * see file review completed by Greg Mize						

SECTION I: IU EVALUATION (Continued)

File <u>A</u>	File <u>B</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					F. OTHER	
①	①				<u>Surcharges</u> <u>streamlining consistency</u>	
②	②					
Comments ① Surcharge levels contained in limitations table. Recommend making separate table clarifying that exceedances are not violations. ② Once streamlining changes are adopted by CA, permits will need to be revised for consistency. For example, the SNC definition in the permit will need to be updated.						

SECTION I COMPLETED BY: <u>Laurel Rognstad</u> TITLE: <u>EPSI</u>	DATE: <u>7/6/14</u> TELEPHONE: <u>615-532-8786</u>
--	---

SECTION I: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE <u>B</u> Industry name and address POWDER COTE II, LLC 193 FRANK L. DIGGS DRIVE CLINTON, TN 37716	Type of industry METAL FINISHING / POWDER COATING	
<input checked="" type="checkbox"/> CIU 40 CFR <u>433.17</u> , _____, _____ Category(ies) <u>433, 433.17</u>	Average total flow (gpd) DOMESTIC NOT LOGGED	Average process flow (gpd) 36,327
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments - PERMIT EFFECTIVE DATE → JULY 1, 2014 EXPIRATION DATE → JUNE 30, 2016 - NEW PERMIT HAS BEEN ISSUED W/ EFFECTIVE DATE OF JULY 1, 2016 AND EXPIRES JUNE 30, 2018 - POWDER COTE II, LLC PERMITTED AS "PLANT #1 AND PLANT #2" → PROCESS STREAM IS COMBINED AND THERE ARE TWO DOMESTIC STREAMS SAMPLED.		
FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)

FILE _____ Industry name and address		Type of industry	
[] CIU 40 CFR _____, _____, _____		Average total flow (gpd)	Average process flow (gpd)
Category(ies) _____		Industry visited during audit Yes [] No []	
[] Other SIU [] Non SIU			
Comments			

FILE _____ Industry name and address		Type of industry	
[] CIU 40 CFR _____, _____, _____		Average total flow (gpd)	Average process flow (gpd)
Category(ies) _____		Industry visited during audit Yes [] No []	
[] Other SIU [] Non SIU			
Comments			

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)		
FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		
General Comments		

SECTION I: IU EVALUATION

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
					a. Statement of duration (≤ 5 years)	
					b. Statement of nontransferability	
					c. Applicable effluent limits (local limits, categorical standards, Best Management Practices)	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
					• Identification of pollutants to be monitored	
					• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
					• Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements (including all monitoring results)	
					• Record-keeping requirements	
					e. Statement of applicable civil and criminal penalties	
					f. Compliance schedules	
					g. Notice of slug loading	
					h. Notification of spills, bypasses, upsets, etc.	
					i. Notification of significant change in discharge	
					j. 24-hour notification of violation/resample requirement	
					k. Slug discharge control plan, if determined by the POTW to be necessary	
Comments						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					3. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					e. Documentation to support the POTW's determination	
Comments						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDRDS	
					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					d. Classification of nonsignificant CIU	403.3(v)(2)
					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
					5. Calculation and application of production based-standards	403.6(c)
					6. Calculation and application of CWF or FWA	403.6(d)&(e)
					7. Application of most stringent limit	403.8(f)(1)(ii)
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">Comments</div>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
					Sampling	
✓					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
					2. Sampling at frequency specified in approved program	
✓					3. Documentation of sampling activities	403.8(f)(2)(vi)
✓					4. Analysis for all regulated parameters	
✓					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
✓					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
					7. Inspection at frequency specified in approved program	
✓					8. Documentation of inspection activities	403.8(f)(2)(vi)
① ✓					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
Comments ① System has "ACCIDENTAL DISCHARGE AND SLUG LOAD PREVENTION PLAN" AS PART OF PERMIT. - INSPECTION DATES → 08-06-15, 08-08-14, 08-09-13, 08-03-12, 08-03-11 - SAMPLING & INSPECTION ANNUALLY						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
B	—	—	—	—	D. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vi)
✓					a. Discharge violations	
✓					b. Monitoring/reporting violations	
N/A					c. Compliance schedule violations	
✓					2. Calculation of SNC	403.8(f)(2)(vi)
✓					3. Adherence to approved ERP	403.8(f)(5)
N/A					4. Escalation of enforcement	403.8(f)(5)
✓					5. Publication for SNC	403.8(f)(2)(vi)
<p>Comments</p> <p>IK exceeded Zinc monthly average of 1.48 ppm in Nov. 2013. 2.3 ppm was recorded value. Violation was considered chronic and TRC violation so was classified as SNC. Required that CUB follow 40 CFR 403.8(f)(2)(vii) and provide list of SNC industrial users to newspaper of general circulation providing meaningful public notice.</p> <p>IU exceeded pH daily Max. and/or Min. in Oct., Nov., and Dec. 2013 and Jan. 2014. The pH excursions/violations were not SNC because no chronic violation occurred, and pH is excluded from a TRC evaluation.</p> <p>The pH excursions, as agreed upon by CUB, would not be violations if they provide QA data. Final solution was to replace meter.</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
B					E. IU COMPLIANCE STATUS	
					Self-Monitoring and Reporting	
✓					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓					2. Analysis of all required pollutants	403.12(g)(1)&(h)
✓					3. Submission of BMR/90-day report	403.12(b) &(d)
✓					4. Periodic self monitoring reports	403.12(e)&(h)
✓					5. Reporting all required pollutants	403.12(g)(1)&(h)
✓					6. Signatory/certification of reports	403.12(l)
—					7. Annual certification by NSCIUs	403.12(q)
					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
✓					• Discharge violation	
✓					• Slug load	
✓					• Accidental spill	
✓					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
—					11. Notification of hazardous waste discharge	403.12(j)&(p)
✓					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
✓					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
					Discharge	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	403.5(a)(1)
					• Spill or slug load	403.12(f)
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
					16. SNC with reporting requirements	403.8(f)(2)(vii)
Comments I had a zinc violation in 2013 resulted primarily from lack of re-sample and notification/communication. Has discussed with personnel and modified policies in-house for IU.						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. OTHER	
Comments						

SECTION I COMPLETED BY: <i>Greg Mize during audit - W&R</i> TITLE: <i>ECI</i>	DATE: <i>6/30/10</i> TELEPHONE: <i>865-594-5513</i>
--	--

SECTION II: DATA REVIEW/IU SITE VISIT

INSTRUCTIONS: Complete this section based on CA activities to implement its pretreatment program. Answers to these questions may be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data may be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit; indicate the reason(s) why these items were not addressed (e.g., lack of time, appropriate CA personnel were not available to answer)
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?

Yes	No
	✓

If yes, discuss.

- b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, DSS requirements, multijurisdictional situation, etc.)?

Yes	No

If yes, describe.

LSR
CA is still working on streamlining changes to ordinance. Mr. Brock stated he plans on submitting SUO & ERP for review. Preliminary approval was given in 2012, but never put on PN/adopted. Need to give CA a due date to submit SUO/ERP w/ streamlining.

- c. Has the CA adopted the 3 required components of the streamlining regulations (slug control requirements referenced in the control mechanism, definition of SNC, and Modification to sampling requirements)?

Yes	No

If not, when? *See above*

- d. Does the CA plan to adopt any of the non-mandatory aspects of the streamlining regulations?

Yes	No
✓	

If yes, describe. *BMPs, otherwise unsure*

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

B. LEGAL AUTHORITY [403.8(f)(1)]

1. Are there any contributing jurisdictions discharging wastewater to the POTW?

Yes

No

If yes, explain how the legal authority addresses the contributing jurisdictions.

Anderson Co. Water Authority (ACWA)
CA samples at locations where their discharge enters → surcharge
ACWA does have IUs that discharge, but none have been determined to be significant.
CA needs to review agreement, ensure ACWA updates SUO as needed.

2. a. Has the CA updated its legal authority (e.g., SUO) to reflect changes in the General Pretreatment Regulations?

Yes

No

b. Has the CA updated its legal authority to reflect the streamlining changes?

c. Did all contributing jurisdictions update their SUOs in a consistent manner?

ND

Explain see A.1.b., B.1.

3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?

Yes

No

If yes, explain.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. How does the CA define SIU? (Is it the same in contributing jurisdictions?)

*Categorical
25,000 gpd +
5%.*

*Same as state/fed rule, no NSCIU option
Mr. Brock was easily able to find the definition in the SUO.*

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

Discuss any problems.

Industrial waste surveys are sent to industries. CA looks at survey forms and applications to categorize IUs.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

Mr. Brock plans to send surveys to 5-10 industries within the next 6 months. He plans to conduct a full survey in about 2 years. CA also surveys Anderson Co. (contributing jurisdiction).

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)?

Collection system monitoring could recognize changes and volume changes, odor & corrosion control weekly monitoring at ACWA and Clinton Industrial park, IWS updates, look at water usage, permit requirement for notification of changes

c. Does the CA have procedures to update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

Yes	No
✓	

d. Indicate which methods are used to update the IWS.

- Review of newspaper / phone book
- Review of water billing records
- Review of plumbing / building permits

CUB service applications

✓
✓
✓

- Onsite inspections
- Permit application requirements
- Citizens involvement
- Other (specify)

✓
✓
✓
✓

e. How often is the IWS to be updated?

At least every 5 years

- Mr. Brock does cross-connections for CUB
- ECHO (EPA)

- Industrial park website
- Chamber of Commerce
- Word of mouth

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

C. IU CHARACTERIZATION (continued) [403.8(f)(2)(i)&(ii)]

4. How many IUs are currently identified by the CA in each of the following groups?

- | | | | |
|----|---|---|---------------------|
| a. | 2 | SIUs (as defined by the CA) [WENDB - SIUS] | |
| | 2 | CIUs | |
| | 0 | Zero-discharging SIUs | |
| | 0 | Noncategorical SIUs (including zero-discharging noncat. SIUs) | |
| b. | 2 | Other regulated noncategorical IUs (specify) | 3M & S.L. Tennessee |
| c. | 4 | TOTAL | |
| d. | 0 | NSCIUs** (as defined by 40 CFR 403.3(v)(2)) | |

List Nonsignificant Categorical Industrial Users:

** A NSCIU never discharges more than 100 gpd of total categorical wastewater (excluding, noncontact cooling and boiler blowdown wastewater) and the following conditions are met:

- Discharger consistently complied with all applicable categorical requirements
- Discharger submits annual certification statement required in 40 CFR 403.12(q)
- Discharger never discharges any untreated concentrated wastewater.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

1. a. How many and what percent of the total SIUs are not covered by an existing unexpired permit, or other individual control mechanism? [WENDB - NOCM] [RNC - II]

2 year permit typically

- b. How many SIUs (as defined by the CA) are required to be covered by a general control mechanism?

List SIUs:

- c. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC - II]

If any, explain.

2. a. Do any UST, CERCLA, RCRA corrective action sites and / or other contaminated ground water sites discharge wastewater to the CA?

No

- b. How are control mechanisms (specifically limits) developed for these facilities?

Discuss

N/A

3. a. Does the CA accept any waste by truck, rail, or dedicated pipe?
b. Is any of the waste hazardous as defined by RCRA?

Yes

No

☒

☒

CA does not accept any hauled waste. Mr. Brock said he was considering having WB's fog program do all hauling of O&G pumping through contract from restaurants to Valley Proteins (grease recycling).

- c. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)]

n/a, CA does not accept hauled waste at WWTP

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.8(f)(2)(iii)]

N/A

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

PT ListSerr, Mr. Brock plans to attend PT training, EPA online seminars, Brett Ward (UT MTAS)

3. Local limits evaluation: [403.8(f)(4); 122.21(j)]

- a. For what pollutants have local limits been set

PTL parameters, BOD, TSS, pH, TKN, O₂G, Biosolids

- b. How were these pollutants decided upon ^{USE}

PTL, biosolids, ~~compatible~~

- c. What was the most prevalent / most stringent criteria for the limits

varies

- d. Which allocation method(s) were used?

uniform

- e. Has the CA identified any pollutants of concern beyond those in its local limits?
If yes, how has this been addressed?

Yes	No
	✓

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (Continued)

4. What problems, if any, were encountered during local limits development and/or implementation?

No issues noted by CA
 Noted issues with ~~state~~^{LSR} surcharge vs
 local limits in PT files

5. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA?

Yes	No
<input checked="" type="checkbox"/>	

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

CA samples yearly
 inspects yearly
 SIUs ~~report~~^{sample} Flow & pH daily, report monthly
 SIUs sample all parameters semiannually
 AISIN - TPO & phenol monthly

b. Is the frequency established above more, less, or the same as required?
 Explain any difference.

yes. Reviewed requirements in program, CA is following requirements.

c. If the CA does all of the sampling in lieu of the industry, does the CA repeat the sample and analysis within 30 days of any violation?

No, CA does not sample in lieu of industry.

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]
 (Define the 12 month period 6/30/15 to 6/30/16.)

a. Not sampled or not inspected at least once [WENDB - NOIN]

0	0	%
---	---	---

b. Not sampled at least once

0	0	%
---	---	---

c. Not inspected at least once (all parameters) ?

0	0	%
---	---	---

If any, explain. Indicate how percentage was determined (e.g. actual, estimated).

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

F. COMPLIANCE MONITORING (Continued)

3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report? [WENDB] [RNC - II]

SNC Evaluation Period

10/1/15^{LSA} - 3/31/16

*SNC defined by:

0	0	%
0	0	%
0	0	%

Applicable pretreatment standards and reporting requirements

Self-monitoring requirements

Pretreatment compliance schedule(s)

POTW

EPA



3a. Indicate the number of SIUs that have been in 100% compliance with all pretreatment requirements?

Evaluation Period: 10/1/15 - 3/31/16

Number of SIUs: 2

Names of SIUs: AISIN, Powder Cote II

4. What does the CA's basic inspection include? (Process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous waste handling procedures, sampling procedures, laboratory procedures, and monitoring records.) [403.8(f)(2)(v)&(vi)]

Ask about any updates, file review, process areas, cleanliness, chemical storage, PT system, laboratories, pH monitor, calibration logs
Mr. Brock follows inspection form.

5. Who performs CA's compliance monitoring analysis?

Performed by: CA/Contract Laboratory Name

- Metals
- Cyanide
- Organics
- Other (specify)

Microbac

Microbac

Microbac

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(vi)]

CA has done splits with the industry in the past.
Discussed verification of lab results if necessary.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

F. COMPLIANCE MONITORING (Continued)

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

N/A, No issues noted

8. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]

Yes

No

If yes, summarize.

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug control plan? [403.8(f)(2)(v)]

CA evaluates every two years. Both industries have slug control plans.

b. How many SIUs were not evaluated for the need to develop slug discharge control plans*?

0

* For dischargers identified as significant prior to November 14, 2005, this evaluation must be performed at least once by October 14, 2006. Additional SIUs must be evaluated within 1 year of being designated as a SIU.

10. Does the CA use Best Management Practices (BMPs) as a local limit? If yes, did they make necessary changes to their legal authority and the IU control mechanism? Do they have documentation of supporting rationale for each BMP?

No

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(vii)]

Same as State / fed rules, before streamlining
plus provision for continuous pH violations,
reports 30 days late instead of 45 (more stringent)

2. ERP implementation: [403.8(f)(5)]

a. Status

Approved, CA will submit streamlining change ERP with SDU
for approval

b. Problems with implementation

No

c. Is the ERP effective and does it lead to compliance in a timely manner? Provide examples if any are available.

Yes; CA has not had to use ERP much beyond NCRs. Permit
exceedance → NCR issued → compliance attained

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

b. If yes, are they appropriate? Provide examples.

Yes	No
	✓
	✓

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

G. ENFORCEMENT (Continued)

4. Did the CA publish all SIUs in SNC in the largest daily newspaper in the previous year?
[403.8(f)(2)(vii)]

Yes

No

If yes, attach a copy.

n/a, no SNC in last year

If no, explain.

5. How many SIUs are in SNC with self - monitoring requirements and were not inspected and / or sampled (in the four most recent full quarters)? [WENDB]

n/a

6. a. Has the CA experienced any problems since the last inspection (interference, pass through, collection system problems, illicit dumping of hauled wastes, or worker health and safety problems) caused by industrial discharges?

Unk

Yes

No

b. If yes, describe and explain the CA's enforcement action against the IUs causing or contributing to problems.
[RNC - I]

n/a

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

CUB has a policy Mr. Brock uses. Discussed requirements. Mr. Brock reviewed confidentiality section of SLO.

2. How are requests by the public to review files handled?

~~CA~~ ^{USA} Mr. Brock does not have a procedure in place. Discussed need for plan, potential of CUB having a policy.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (Continued)

3. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

CA's data management appeared effective and well-organized.

4. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

Mr. Brock has not had to put any documents on public notice. Discussed requirements.

5. Explain any public or community issues impacting the CA's pretreatment program.

None

6. How long are records maintained? [403.12(o)]

3+ years

Mr. Brock found requirement in SUO for IUs
Over 3 years kept at CURB, 2-3 years before that is archived

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program. [Consider: legal assistance, permitting, IU inspections, sample collection, sample analysis, data analysis, review and response, enforcement, and administration (including record keeping and data management)].

0.5 FTEs

Mr. Brock ^{USA} mostly does almost all the PT work. He gets assistance sometimes with sampling, some help from Dan Hawkins (Director of Water & Sewer) enforcement / administrative

Mr. Brock ~ 40+50%
This number may increase with 3M / other industries.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

I. RESOURCES [403.8(f)(3)] (Continued)

2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)

Yes

No

☒

3. a. Estimate the annual operating budget for the CA's program.

\$ 10,000

Mr. Brock will look into this, report back.

+ salary in part

b. Is funding expected to: stay the same, increase, decrease (note time frame; e.g., following year, next 3 years, etc.) ?

Discuss any changes in funding.

See attached email from Mr. Brock 7/14/14 - LSR

4. Discuss any problems in program implementation which appear to be related to inadequate resources.

No

5. a. How does the CA ensure personnel are qualified and up - to - date with current program requirements?

Mr. Brock does almost all pretreatment.

Chief WWTP operator helps with sampling, has training, certified level 4 operator.

Yes

No

☒

b. Does the CA have adequate reference material to implement its program?

6. Identify the sources of funding for the pretreatment program.

CUB

a. POTW general operating fund

b. IU permit fees

c. Industry surcharges

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

d. Monitoring charges

e. Other (specify)

<input checked="" type="checkbox"/>
<input type="checkbox"/>

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

[illegible]

- b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Explain any differences.

Yes	No
	✓

- Improvements in POTW operations
- Loadings to and from the POTW
- NPDES permit compliance
- Sludge quality ?

b. Has the CA documented these findings ?

c. If they have been documented, what form does the documentation take? Explain. (Attach a copy of the documentation, if appropriate.)

 $n \leq 6$

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

J. ENVIRONMENTAL EFFECTIVENESS / POLLUTION PREVENTION (Continued)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Discuss on pollutant - by - pollutant basis.

n/a

4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

Yes

No

☒

If yes, what was found?

local limits development only

5. a. Has the CA attempted to implement any kind of public education program?
b. Are there any plans to initiate such a program to educate users about pollution prevention?
Explain.

Yes

No

☒

*Grease educational brochure used to be available at CUB office
BMPs handout for restaurants for grease
Cross-connection brochure handed out from office
RCRA brochures See attached*

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

none